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May 20, 2014

Hon. Valerie Caproni
United State District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 240
New York, NY 10007

**Re: Maurizio Sacerdote v. George M. Pavia et al.
13-CV-8043 (VC) (ECF Case)**

Dear Judge Caproni:

We represent the Plaintiff Maurizio Sacerdote in the above referenced action and write jointly with counsel for the Defendants George M. Pavia and Pavia & Harcourt LLP to inform Your Honor that the parties are finalizing a settlement agreement in this matter. Plaintiff's counsel is waiting to hear back from counsel for the Defendants on the one remaining issue which needs to be resolved to finalize the settlement agreement.

In order to finalize the settlement agreement, the parties jointly request a two week extension on: (i) the deadlines to complete depositions and to complete discovery from May 21, 2014 and May 22, 2014, to June 4 and June 5, 2014, respectively, (ii) the deadlines to file post-discovery summary judgment motions which are currently due May 28, 2014 to June 11, 2014, and (iii) the deadlines to file answering papers and reply papers which are due June 6, 2014 and June 13, 2014 to June 20, 2014 and June 27, 2014.

Prior to this request, the parties have asked for an adjournment and for three brief extensions of time, which were granted by Your Honor on March 14, 2014, April 15, 2014, and April 30, 2014.

A status conference has been scheduled for June 30, 2014 at 10 a.m.

We thank the Court for its consideration.



Respectfully submitted,



Lydia Ferrarese

cc: Howard S. Jacobowitz (via ECF)